

Public Construction Activities and Long Term Maintenance Programs

**Regional Water Quality Control Board Workshop
Draft Ventura County Stormwater Permit
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Public Construction Activities Management Draft Permit §5.G.I.1

“(a) Each Permittee shall implement and comply with the Planning and Land Development Program requirements in Part 5.E of this Order at all Permittee owned or operated public construction projects.”

- Why?
- Example: Traffic signal construction project – minimal disturbed area

“(b) Each Permittee shall implement and comply with the Development Construction Program requirements in Part 5.F. of this Order at all Permittee owned or operated construction project

- Example: Minor water line replacement – minimal disturbed area; line, grade, capacity and original use of facility unchanged by construction activity

“(c) Each Permittee shall obtain coverage under the CASGP for construction activities and projects that are:

(1) Covered under one (or more) Capital Improvement Projects (including but not limited to street repaving, new streets, channel clearing) or contract, and that individually or *cumulatively* disturb 1 acre or more of land..”

- Projects that “*cumulatively* disturb 1 acre or more”?
- Public Capital Improvement Plans are not like a “common plan of development” in the private sector.

Long Term Maintenance Programs Draft Permit §5.G.1.2(b)

“(b) Each Permittee shall obtain coverage under the CASGP no later than (7 days after Order adoption date) for long-term maintenance programs including maintenance of flood control channels (such as vegetation removal), maintenance or replacement of streets, sidewalks, roads, and any other project the Permittee undertakes including all Capital Improvement Projects (CIP) if either 1 or more acres of land are disturbed by grading, clearing or excavation activities for an individual project or cumulatively as a part of several projects involving a soil disturbance.”

Recommendations

- The Ventura County Stormwater Permit should require the Permittees to meet the same permit requirements as those imposed on other (non-permitted) public agencies and private companies.
- Revise the draft permit language so that it is consistent with the definition of “construction”.